

NUSA

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

'08 MJ 8820

UNITED STATES OF AMERICA,

Plaintiff,

v.

Maria Antonieta ALAMOS

Defendant.

Magistrate Case No.:

COMPLAINT FOR VIOLATION OF


21 U.S.C. § 952 and 960

Importation of a Controlled Substance  
(Felony)


The undersigned complainant being duly sworn states:

That on or about September 5, 2008, within the Southern District of California, defendant Maria Antonieta ALAMOS, did knowingly and intentionally import approximately 51.02 kilograms (112.24 pounds) of Marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

  
Robert J. Fejeran Jr.  
Special Agent  
U.S. Immigration and Customs  
Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, SEPTEMBER 8<sup>TH</sup>, 2008.

  
PETER C. LEWIS  
U.S. MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Maria Antonieta ALAMOS

4 **PROBABLE CAUSE STATEMENT**

5 This complaint is based on the personal observations, investigation, and  
6 information furnished to U.S. Immigration and Customs Enforcement Special Agent  
7 Robert J. Fejeran, Jr.

8 On September 5, 2008, at approximately 0650 hours, Customs and Border  
9 Protection Officer (CBPO) A. Zuniga was manning vehicle primary inspection lane #9 at  
10 the Calexico CA West Port of Entry (WPOE) when a 1998 Hyundai Sonata bearing  
11 California License plate CA/US 4ZQR323 approached her lane for entry into the U.S.  
12 CBPO Zuniga encountered the operator and sole occupant of the vehicle, Maria  
13 Antonieta ALAMOS. ALAMOS gave CBPO Zuniga a negative oral customs declaration.  
14 CBPO Zuniga noticed that ALAMOS kept asking her to repeat every question she  
15 asked, as if ALAMOS could not hear her. ALAMOS claimed ownership of the vehicle  
16 stating that she was on her way home to Calexico. CBPO Zuniga conducted an  
17 inspection of the trunk where she noted a very strong odor of what she thought was air  
18 freshener. She came around the vehicle and peaked into the semi open passenger  
19 side window and noted that the air freshener odor was even stronger from the vehicle  
20 interior.

21 CBPO Zuniga also observed a depth discrepancy in the floorboard of the vehicle.  
22 ALAMOS and the vehicle were referred to vehicle secondary for further inspection.

23 In vehicle secondary, a Human and Narcotic Detector Dog alerted to the floor of  
24 the vehicle. CBPO J. Ciolina was assigned to vehicle secondary at the time and also  
25 noted a very strong air freshener odor emitting from the vehicle. A search of the vehicle  
26 resulted in the discovery of several packages hidden in the back rest or the rear seat  
27 and rear door. A non factory compartment in the floorboard underneath both front both  
28 front seats was also discovered.  
29

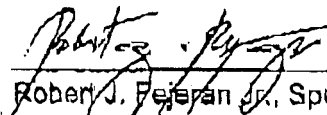
1  
2 UNITED STATES OF AMERICA

3 v.  
4 Maria Antonieta ALAMOS

5 The linoleum tiles that were used to cover the access holes to the compartment were  
6 removed, resulting in the discovery of additional packages hidden in the compartment.  
7 One of the packages was probed producing a green leafy substance, which field-tested  
8 positive for the presence of marijuana. A total of forty (40) packages, with a total  
9 approximate weight of 51.02 kilograms (112.24 pounds) of marijuana were removed  
10 from the vehicle.  
11

12 ALAMOS was advised of her rights per Miranda, which she acknowledged and  
13 waived. ALAMOS admitted to "drugs" being hidden in the vehicle and that it was illegal  
14 to smuggle "drugs" into the U.S. ALAMOS said that she was to be paid \$3,000.00  
15 dollars to the vehicle to Los Angeles, CA.  
16

17 Executed on September 5, 2008, at 1734 hours.

18   
19 Robert J. Pejeran Jr., Special Agent  
20 Immigration and Customs Enforcement

21  
22 On the basis of the facts presented in the attached probable cause statement  
23 consisting of 2 page(s), I find probable cause to believe that the defendant(s)  
24 named in this probable cause statement committed the offense on September 5, 2008,  
25 in violation of Title 21, United States Code, Sections 952 and 960.  
26

27   
28 LUISA S. PORTER  
29 U.S. MAGISTRATE JUDGE

9/5/08 8:00 PM  
DATE/TIME